

Waste Compliance and Mitigation Program Staff Report
New Major Waste Tire Storage Facility Permit for Tri-C Manufacturing, LLC.
TPID No. 1480835
March 17, 2010

Background Information, Analysis, and Findings:

This report was developed in response to an application received from the operator of Tri-C Manufacturing Inc., located at 520 Harbor Blvd in the City of West Sacramento for a Major Waste Tire Storage Facility Permit. The facility accepts waste tires from commercial haulers as well as common carriers and completely processes them into crumb rubber, fiber and steel feedstock. The business is considered an end use tire generator and hauler that accepts waste tires.

Staff of the Waste Compliance and Mitigation Program, Permitting and Local Enforcement Agency Support Division received the application for a Major Waste Tire Facility Permit on December 3, 2009. On December 24, 2009 staff of the Permitting and Local Enforcement Agency Support Division accepted the application as complete and pursuant to 14 CCR, Section 18425, CalRecycle has 180 calendar days from the date the application is accepted as complete to either issue or deny the issuance of a WTFP. CalRecycle is required to act by June 22, 2010.

The following table summarizes the staff's findings relative to the permit application:

	Findings	
Compliance with Tire Storage Standards, 14 CCR, Sections 17350-17356	Staff of the Compliance Evaluation and Enforcement Division conducted an inspection of the facility on January 13, 2010. No violations of State Minimum Standards or inconsistencies with the permit application were noted during the inspection. See additional compliance information below.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
Application Forms (500-504) - 14 CCR, Sections 18431(a) (b) (c) (d)	All application forms were accepted by Permitting and Local Enforcement Agency Support Division staff as complete on December 24, 2009.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
Local Requirements 14 CCR, Section 18431(h)	<i>Local Vector Control:</i> The Sacramento-Yolo Mosquito and Vector Control District's acceptance of vector control practices was signed by Mr. Marty Scholl, Ecological Management Supervisor, on June 4, 2009. <i>Local Fire Authority:</i> On October 20, 2008, the West Sacramento Fire Department (WSFD) informed the CIWMB (now CalRecycle) that all required Fire approvals had been issued to Tri-C Manufacturing,	

	<p>located at 520 Harbor Boulevard in West Sacramento. On May 1, 2009, Tri-C Manufacturing submitted a request to the WSFD to store between 50 and 80 tons of 2.5" tire chips on the property to be used as feedstock for the granule plant. Mr. Jason M. Rizzi, Hazardous Materials Manager for the WSFD determined on June 1, 2009, that the tire chip storage does not require additional fire permits and is consistent with previous operations conducted at the site.</p> <p><i>Storm Water Discharge Pollution Prevention:</i> On February 17, 2010 the City of West Sacramento's Environmental Program Division notified Tri-C Manufacturing of their review of Tri-C's storm water Best Management Practices. The city made six recommendations to Tri-C. These include:</p> <ul style="list-style-type: none"> • Development and implementation of a storm water event inspection log • Replacing current storm drain inserts with a drain insert capable of capturing debris, oils and sediment • Monitoring of storm drain inlet protection (straw wattle) to ensure maintenance and replacement is conducted • Keep trash receptacles under cover or use receptacles with lids to prevent run-on of storm water • Inspect all equipment for engine oil/hydraulic fluid leaks and repair • Establish proper clean-up and disposal procedures for spilled materials and/or fluids. <p>The applicant has indicated on page 4 of 5 of the Operation Plan implementation of the City's recommended drain filter material and inspection/cleanup procedures.</p>	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
<p>Closure Costs and Financial Liability 14 CCR, Sections 18474</p>	<p>Staff from the Financial Assurances Section of the Cleanup, Closure and Financial Assurances Division on November 18, 2009, found that the Trust Fund in support of</p>	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable

and 18491	closure costs and the Certificate of Liability Insurance meet the state requirements.	
California Environmental Quality Act (CEQA)	Staff of the Permitting and Local Enforcement Agency Support Division found that the issuance of the Major Waste Tire Storage Facility Permit is exempt from the requirements of CEQA, see below for details.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
Reviewed by: CalRecycle Legal Office	March 17, 2010	
Compliance Evaluation and Enforcement Division	March 15, 2010	

Compliance History:

A pre-permit inspection for a proposed Major Waste Tire Facility was conducted on January 13, 2010 by Bill Motmans, Compliance Enforcement and Evaluation Division, and Scott Beckner, Permitting and Local Enforcement Agency Support Division. No violations were noted on the inspection report. At the time of the inspection, the total number of waste tires and waste tire related products was estimated to be approximately 2,000+. Bill Motmans, observed a pile of 800+ waste tires; a pile of shredded rubber (greater than ¼ inch) containing approximately 800+ passenger tire equivalents; four wooden boxes containing crumb rubber (less than ¼ inch) each weighing approximately 1 ton and approximately 400 waste tires and inner tubes stored around the facility. Mr. Michael Hunsaker (Operations Manager) stated that they obtain crumb rubber from North State Bandag Co, which is mixed with primary shred waste tires to improve grinding operations.

The site was once permitted under a prior operator, Tri-C Tire Recycling Inc. A fire occurred on March 11, 2008 at the facility that resulted in crumb rubber and pyrolytic oil entering the storm drain system and the City of West Sacramento Fire Department was called in to the scene. The previous operator abandoned the site and tire processing operations ceased.

In September of 2008, Clyde Lamar, the owner of the property at 520 Harbor Blvd., met with staff and stated to his intentions to start a new tire shredding business with Tri-C Manufacturing Co. Inc. conducting operations and inquired about permit requirements. Staff determined that Mr. Lamar would need to apply for a new permit.

On October 30, 2008, Tri-C Manufacturing Co. Inc was issued a new Minor Waste Tire Facility Permit to store up to 4,999 waste tires.

Environmental Analysis:

The new Major Waste Tire Facility Permit for operations at the Tri-C Manufacturing tire facility in West Sacramento would allow the storage of up to 10,000 passenger tire equivalents (PTE) which is an increase above the 4,999 PTE allowed under the current Minor Waste Tire Facility Permit. The proposed permit will allow for the storage of up to 50 tons (or 5,000 PTE) of tire chips to be used for feedstock for the new granule mill in an existing 30 foot x 40 foot x 6 foot bunker area. Currently, the tire chips are placed in a truck for transport off-site. No expansion

of the regulated storage area laterally or vertically is proposed. The site is zoned Heavy Industrial (M-2)

When the Tri-C tire manufacturing facility was permitted in 2000 by the City of West Sacramento Community Development Department (City) a determination was made that the proposed operation was an allowed use in the M-2 (Heavy Industrial) Zoning and that a Conditional Use Permit was not required. Department staff contacted the City when Tri-C proposed to increase the number of tires stored on the site from a maximum of 4,999 tires to a maximum of 10,000 tires and tire shreds and the City responded in an e-mail to staff dated June 26, 2009, stating that "...the Planning Division will not consider Tri-C's plans to be an expansion because their throughput will not increase...". After a detailed analysis by Department staff regarding the storage areas for tires it was determined that the permitted tire storage area will also not increase.

Department staff conducted a preliminary review, and have not identified any direct or indirect physical change in the environment resulting from the change in the permitted area that tires are stored on site. The number and location of the tire storage piles within the area will not change. The maximum dimensions of the tire storage piles limit the amount of whole tires that may be stored on site at any one time to below 4,999 PTE, the same amount as currently allowed in Tri-C's Minor Waste Tire Facility Permit. The only change is an increase in density of the tire piles as the piles will contain more shreds and less whole tires. By reducing the amount of void space within the tire storage piles more passenger tire equivalents can be stored in the same air space.

Fire danger and vectors are the main concerns relative to the increase in tire storage at the site. Tire shreds and tire granules burn differently from whole tires. Whole tires have more air space due to larger voids than shreds and granules, therefore whole tires will burn throughout the pile and shreds and granules will tend to burn on the surface. There is an overall reduction in potential fire danger with the storage of shreds and granules compared to whole tires. Shreds and granules do not provide harborage for flies and mosquitoes as can whole tires. There is an overall reduction in the potential of vector attraction and breeding with the storage of shreds and granules.

As a result of the preliminary review CalRecycle staff have concluded that there is no potential for a significant impact resulting from the additional storage of shreds and granules at the site and find that a Class1 Categorical Exemption (14 CCR, Section 15301) is appropriate.

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities...involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

If CalRecycle approves the project and the CEQA exemption, CalRecycle staff will file a Notice of Exemption with the State Clearinghouse in compliance with CEQA Guidelines Section 15301.

Local Issues:

Staff has not identified any local issues related to this item. No environmental justice issues were identified by the surrounding community. According to the year 2000 Census data, tract

102.03 in Yolo County has a total population of 5,370 people. 53.7% of the people are white, 4.9 % are black, 3.7% are American Indian, 12.3% are Asian and 25.1% some other race. 36% of the population is identified as Hispanic or Latino. The median household income of the area is \$25,341 and 29.0% live below the poverty level. Therefore staff finds the project and permit process to be consistent with Government Code Section 65040.12, as there has been fair treatment of people of all races, cultures, and incomes with respect to the proposed action being recommended in this item.

Public Comments:

Department staff discussed this proposed Major Waste Tire Facility Permit at the monthly meetings conducted by the Waste Compliance and Mitigation Program held on January 11, February 8, and March 8, 2010. No public comment was received on this project during these meetings and no other public comment has been received by Department staff.

Attachment: Major Waste Tire Facility Permit